



## WASHINGTON COUNCIL OF COUNTY SURVEYORS

President: John Christensen, PLS, Franklin County  
President Elect: Ronald L. Torrence, PLS, Snohomish County  
Secretary/Treasurer: Tom Gray, PLS, Grays Harbor Co.

July 25, 2011

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

FILED/ACCEPTED

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Federal Communications Commission  
Office of the Secretary

RE: FCC File No. SAT-MOD-20101118-00239

Dear Sir or Madam,

The Washington Council of County Surveyors (WCCS) is deeply concerned that the LightSquared proposal, as submitted, will significantly interfere with the high precision GPS receivers that we rely on every day.

If LightSquared is allowed to move forward with their plan, it would cause a great amount of damage to the precision of our GPS equipment which amounts to millions of dollars invested throughout the state of Washington. This is an expense that we cannot overcome.

Most of our counties have seen job cutbacks resulting in a reduced number of people per crew. Precision GPS equipment is allowing us to proceed forward with smaller crews and still get the same amount of work completed. Without the accuracy of GPS, we would be devastated.

We understand the need and importance for more capacity and wider coverage for wireless broadband. Having this would be a great benefit for us as surveyors. Unfortunately, we cannot allow it to come at the expense of our high precision GPS equipment we currently use. I urge you to ensure that we, the precision users of GPS, are not damaged in any way. Therefore, we respectfully request the following:

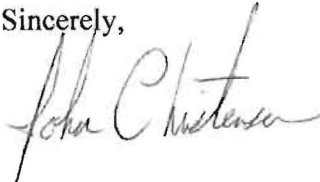
1. The FCC must make clear, and the NTIA must ensure, that LightSquared's license modification is contingent on the outcome of the mandated study unequivocally demonstrating that there is no interference to GPS. The study must be comprehensive, objective, and based on correct assumptions about existing GPS uses rather than theoretical possibilities. Given the substantial pre-existing investment in GPS systems and infrastructure, and the critical nature of GPS applications, the results of studies must conclusively demonstrate that there is no risk of interference. If there is conflicting evidence, doubts must be resolved against the LightSquared terrestrial system. The views of LightSquared, as an interested party, are entitled to no special weight in this process.

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2. The FCC should make clear that LightSquared and its investors are proceeding at their own risk in advance of the FCC's assessment of the working group's analysis. While this is the FCC's established policy, the Commission's International Bureau failed to make this explicit in its order.
3. Resolution of interference has to be the obligation of LightSquared, not the extensive GPS user community of millions of citizens. LightSquared must bear the costs of preventing interference emanating from their devices, and if there is no way to prevent interference, it should not be permitted to operate. GPS users or providers should not have to bear any of the consequences of LightSquared's actions.
4. This is a matter of critical national interest. There must be a reasonable opportunity for public comment of at least 45 days on the report produced by the working group and further FCC actions on the LightSquared modification order should take place with the approval of a majority of the commissioners, not at the bureau level.

Thank you for your time and consideration for our concerns and requested items.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Christensen".

John Christensen, PLS  
WCCS President